

EXHIBIT A

TAKE FLIGHT EDUCATION LLC vs HARLEYSVILLE WORCESTER INSURANCE CO

23-C-01319-S4



Date	Event	Type	Comments	Documents	Pages	Price	All	All
2/28/2023	Filing	Summons		Summons.tif	1	\$2.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
2/28/2023	Filing	Certificate of Service		take flight cert of service.pdf	1	\$2.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
2/28/2023	Filing	Complaint/Petition		take flight complaint.pdf	12	\$13.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
2/28/2023	Filing	General Civil/Dom Relations Case Filing Form		General Civil/Dom Relations Case Filing ...	1	\$2.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
6/13/2023	Hearing	No Service Calendar	-	-	-	-		
6/14/2023	Filing	Order		23-C-01319-S4 dwop.pdf	1	\$2.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
6/14/2023	Filing	ORDER	DISMISSAL FOR WANT OF PROSECUTION	23-C-01319-S4 dwop.pdf	1	\$2.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
6/21/2023	Filing	MOTION TO REOPEN CASE	motion to set aside	take flight motion .pdf	3	\$4.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
7/24/2023	Filing	Motion	motion for the appointment of private process	take flight motion ofr private process serv...	4	\$5.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
7/24/2023	Filing	ORDER	ORDER SETTING ASIDE DISMISSAL FOR W	23-C-01319-S4.pdf	1	\$2.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
7/25/2023	Filing	ORDER	ORDER OFR APPOINTMENT OF PRIVATE P	23-C-01319-S4.pdf	1	\$2.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
7/25/2023	Filing	Summons	summons	TAKE FLIGHT EDUCATION LLC summon...	1	\$2.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>
8/24/2023	Filing	Affidavit of Process Server	affidavit of service	TAKE FLIGHT AFFIDAVIT OF SERVICE.pdf	1	\$2.50	<input type="button" value="Add"/>	<input type="button" value="Print"/>

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

TAKE FLIGHT EDUCATION LLC, Plaintiff,	
v.	CAFN:
HARLEYSVILLE WORCESTER INSURANCE COMPANY, Defendant.	

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

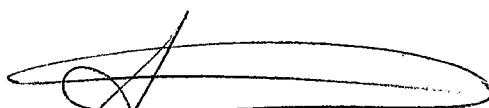
You are hereby summoned and required to file with the Clerk of said Court, **Clerk's Civil Office Clerk, GWINNETT County State Court, 75 Langley Dr, Lawrenceville, GA 30046** and serve upon the Plaintiff's attorney whose name and address is:

Amadu Wiltshire Esq.
LAW OFFICES OF WILTHSIRE LLC
1196 K Ashborough Dr SE
Marietta, GA 30067
amaduwiltshire22@gmail.com

An answer to the Complaint, which is herewith served upon you, must be filed within 30 days after service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

This 27th day FEBRUARY 2023

Clerk, STATE Court Dekalb County, Georgia



AMADU WILTHSIRE
1196 K ASHBOROUGH DR SE
MARIETTA GA 30067
3147640888
AMADUWILTHSIRE22@GMAIL.COM

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

Take Flight Education, LLC.

Plaintiff,

v.

Harleysville Worcester Insurance Company

Defendant.

CIVIL ACTION NO.:

23-C-01319-S4

CERTIFICATE OF SERVICE

This is to certify that I have served Harleysville Worcester Insurance Company upon the Complaint:

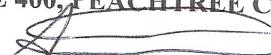
- a) by placing a copy in the United States Postal Service, with postage prepaid, or
- b) by hand delivering a copy

- 1. to the opposing party who is representing him/herself without an attorney

OR

- 2. to the attorney or registered agent for the opposing party whose name and address are listed below: 2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA

This 27th day of February, 2023


AMADU WILTSHERE, Esq.

Georgia Bar No 473499

Law Offices of Wiltshire LLC

1196 k Ashborough Dr SE, Atlanta, GA 30067

Tel. (314) 764-0888

amaduwiltshire22@gmail.com

Attorney for Plaintiff

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

Take Flight Education, LLC.

Plaintiff,

v.

Harleysville Worcester Insurance Company

Defendant.

CIVIL ACTION NO.:

23-C-01319-S4

COMPLAINT

Plaintiff, Take Flight Education LLC (hereinafter "Plaintiff"), by and through undersigned counsel, sues Defendant, Harleysville Worcester Insurance Company (hereinafter "Defendant", and in support thereof alleges as follows:

VENUE AND JURISDICTION

1. The Plaintiff is a business operating out of 3525 Duluth Park Lane Duluth GA 30096 in Gwinnett County, Georgia.
2. The Defendant currently conducts an insurance business in the state of Georgia, including Gwinnett County and has a registered agent at **2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA**. Defendant is authorized to transact business and has transacted substantial business in Georgia, and avails itself of the laws of the State of Georgia. Accordingly, this Court has personal jurisdiction over Defendant.
3. This action arises out of an insurance policy.
4. This Court has jurisdiction over the parties and subject matter of this action pursuant to O.C.G.A. § 15-9-30.
5. This Court is the proper venue for this action pursuant to O.C.G.A. § 9-10-93 because the

actions described herein took place in Gwinnett County, Georgia and is a claim valued in excess of \$331,354.03.

GENERAL ALLEGATIONS

6. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1 through 5 of this Complaint.
7. This is an action for breach of contract, breach of the duty of good faith and fair dealing, and punitive damages.

THE POLICY

8. Plaintiff purchased from the Defendant a Commercial Policy with Policy number: MPA0000004675BC (“Policy”), with a policy period beginning December 30, 2020 and ending December 30, 2021
9. Under the Policy’s provisions, Defendant agreed to pay for “Commercial property Coverage; Commercial General Liability Coverage; Crime and Fidelity Policy Coverage; Commercial Inland Marine Coverage; Commercial Auto Coverage; Commercial Liability Umbrella Policy; Human Services Professional Liability; Human Services Abuse/Molestation.” A true and correct copy of the Policy is attached hereto as Exhibit 1.
10. The Policy Declarations describes the premises as 3525 Duluth Park Ln Duluth, GA 30096-3280.
11. The Policy provides for [Property Damage Liability]. Under this Policy, it is states, “we will pay those sums that the insured becomes legally obligated to pay as damages because of “bodily injury” or “property damages” to which this insurance applies.
12. The Policy also provides for “Conditions—Insurable Interest and Limit of Liability”.

DEFENDANT’S BAD FAITH REFUSAL TO PAY

13. Given the total loss Plaintiff suffered, Plaintiff immediately tendered its loss to Defendant to recover under the security it purchased.
14. Despite the Policy provisions providing for coverage for: for "Commercial property Coverage; Commercial General Liability Coverage; Crime and Fidelity Policy Coverage; Commercial Inland Marine Coverage; Commercial Auto Coverage; Commercial Liability Umbrella Policy; Human Services Professional Liability; Human Services Abuse/Molestation." Defendant has only paid \$150,000.00 towards the demand on damages to building. However, there is still personal property, business income, and extra expenses. A true and correct copy of Plaintiff's date of denial letter Letter denying coverage is attached hereto as Exhibit 2. Exhibit 3.
15. In Plaintiff's date of denial letter, Defendant asserted that Plaintiff did not experience type of damage (flood damage) to property.
16. Defendant took this cursory position without investigating the presence of flood damages at Plaintiff's premises.
17. Plaintiff sent Defendant a Demand for Payment on January 9, 2023. Exhibit 4.
18. Defendant's refusal to honor its coverage obligations, have caused Plaintiff significant and deliberating damages.

COUNT I
(Breach of Contract)

19. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1 through 18 of this Complaint.
20. The Policy is a valid contract between Plaintiff and Defendant.
21. The Policy requires Defendant to pay Plaintiff for its losses caused by flood damage which was present.
22. Defendant has breached the contract by refusing to pay Plaintiff the amounts owed under the

Policy.

23. Plaintiff has been damaged by Defendant's breach in an amount in excess of \$331,354.03.

COUNT II
(Breach of the Duty of Good Faith and Fair Dealing)

24. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1 through 23.

25. Defendant has a duty of good faith and fair dealing under the Policy.

26. Defendant has breached its duty of good faith and fair dealing, including as set forth in paragraphs 13 through 18 above.

27. Defendant's coverage position lacked a reasonable basis. Exhibit 2.

28. Defendant failed to conduct a complete investigation prior to denying coverage.

29. Defendant's conduct compelled Plaintiff to file this lawsuit to recover the benefits to which it is entitled under the Policy.

30. Defendant's conduct has caused Plaintiff damages in an amount excess of \$331,354.03.

PUNITIVE DAMAGES

31. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1 through 30 of the Complaint.

32. Defendant intended to injure its policyholder and/or consciously pursued a course of conduct knowing that it created a substantial risk of significant hardship to Plaintiff, as set forth above.

33. Defendant's conduct was oppressive, outrageous, and/or intolerable.

34. Defendant acted intentionally and with the express purpose of harming Plaintiff's interests.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests judgment as follows:

- A. An award against Defendant of actual and compensatory damages, in the amount established by the evidence;
- B. An award against Defendant for damages caused by its bad faith breach of contract;
- C. An award against Defendant of reasonable attorney's fees, costs and disbursements for this action, as provided under common law, and other applicable law;
- D. An award against Defendant of punitive damages in the amount established by the evidence, and as warranted by the egregious nature of Defendant's conduct;
- E. An award for any and all pre-judgement and post judgement interest at the rate applicable under the law; and
- F. Such other and further relief as this Court deems just or proper.

Dated this 27th day of February, 2023.

Respectfully Submitted,



AMADU WILTSHERE, Esq.

Georgia Bar No: 473499

Law Offices of Wiltshire LLC

1196 k Ashborough Dr SE, Atlanta, GA 30067

Tel. (314) 764-0888

amaduwiltshire22@gmail.com

Attorney for Plaintiff

**IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA**

Take Flight Education, LLC.

Plaintiff,

v.

CIVIL ACTION NO.:
23-C-01319-S4

Harleysville Worcester Insurance Company

Defendant.

PLAINTIFF'S LIST OF EXHIBITS

Plaintiff, by and through undersigned counsel, respectfully submits the following list of exhibits relevant to the claims in the Complaint:

1. [Exhibit 1] The Commercial Policy.
2. [Exhibit 2] The Letter Denying Coverage from Nationwide.
3. [Exhibit 3] Proof of Payment from Nationwide for Primrose School of Duluth West's Building.
4. [Exhibit 4] Demand for Payment Letter.

General Civil and Domestic Relations Case Filing Information Form

Superior or State Court of Gwinnett State Court County

For Clerk Use Only

23-C-01319-S4

Date Filed _____
MM-DD-YYYY

Case Number _____

Plaintiff(s)

The Flight Education, LLC

Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix

Defendant(s)

Harleysville Worcester Insurance Company

Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix

Plaintiff's Attorney AMADU AKINOLA WILTSIRE

State Bar Number 473499

Self-Represented

Check one case type and one sub-type in the same box (if a sub-type applies):

General Civil Cases

- Automobile Tort
- Civil Appeal
- Contempt/Modification/Other
- Post-Judgment
- Contract
- Garnishment
- General Tort
- Habeas Corpus
- Injunction/Mandamus/Other Writ
- Landlord/Tenant
- Medical Malpractice Tort
- Product Liability Tort
- Real Property
- Restraining Petition
- Other General Civil

Domestic Relations Cases

- Adoption
- Contempt
- Non-payment of child support, medical support, or alimony
- Dissolution/Divorce/Separate
- Maintenance/Alimony
- Family Violence Petition
- Modification
- Custody/Parenting Time/Visitation
- Paternity/Legitimation
- Support – IV-D
- Support – Private (non-IV-D)
- Other Domestic Relations

Check if the action is related to another action pending or previously pending in this court involving some or all of the same: parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number _____

Case Number _____

I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in OCGA § 9-11-7.1.

Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required _____

Do you or your client need any disability accommodations? If so, please describe the accommodation request.

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

TAKE FLIGHT EDUCATION LLC,)
Plaintiff(s),)
v.) CIVIL ACTION FILE
HARLEYSVILLE WORCESTER) NO. 23-C-01319-S4
INSURANCE CO,)
Defendant(s),)

DISMISSAL FOR WANT OF PROSECUTION

The above-styled case having been called in its order on the Civil No Service Calendar of June 13, 2023, and no appearance being made by Plaintiff,

IT IS HEREBY ORDERED, that process abate therein and said case be dismissed without prejudice.

SO ORDERED this 14 day of June, 2023.

Ronda S. Colvin
RONDA S. COLVIN, Judge
State Court of Gwinnett County

Copy to:

Attorneys/parties of record via efile

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

TAKE FLIGHT EDUCATION LLC, *
*
Plaintiff, * CIVIL ACTION
*
vs. * FILE NO.: 23-C-01319-S4
*
*
HARLEYSVILLE WORCESTER *
INSURANCE CO, *
*
Defendant. *

**MOTION TO SET ASIDE DISMISSAL FOR WANT OF PROSECUTION
AND REINSTATE**

COMES NOW, Plaintiff, **Take Flight Education LLC** (hereinafter "Plaintiff"), by and through counsel of record, and files this Motion to Set aside Dismissal for Want of Prosecution and Reinstate, and shows this Honorable Court the following:

1.

This is a civil suit which was filed by the Plaintiff on February 28, 2023. The Defendant has yet to be served with the Complaint, by no fault of the Plaintiff.

2.

On June 13, 2023, the above matter was called in Open Court on the Civil No Service Calendar, and on June 13, 2023, a Dismissal for Want of Prosecution Order was entered dismissing this matter for failure to appear.

3.

Plaintiff shows that neither the undersigned nor Plaintiff received any notification of said hearing.

WHEREFORE, having fully pled, Plaintiff, Take Flight Education LLC, respectfully

Take Flight Education LLC v. Harleysville Worcester Insurance Co

Gwinnett State Court

CAFN: 23-C-01319-S4

Motion to Set Aside Dismissal for Want of Prosecution and Reinstate

requests that:

- a. This Motion be filed as by law provided;
- b. The Dismissal for Want of Prosecution be set aside and Reinstate same
- c. This matter be placed on the next available calendar for announcement;
- d. Upon consideration of the evidence hereunder, this Court grant the Motion in its entirety; and
- e. For such other and further relief, legal or equitable, as would be in the interest of justice.

Respectfully submitted this the 21 day of June, 2023.



Amadu Wiltshire
Attorney for Plaintiff
Georgia Bar No. 473499

Wiltshire Law
1196 K Ashborough Dr SE
Marietta, Georgia 30067
Phone: 678-559-1883

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

TAKE FLIGHT EDUCATION LLC,

*

*

Plaintiff,

*

CIVIL ACTION

*

vs.

FILE NO.: 23-C-01319-S4

*

*

HARLEYSVILLE WORCESTER
INSURANCE CO,

*

*

Defendant.

*

CERTIFICATE OF SERVICE

This is to certify that as of this date, I have served the following party with the foregoing ***Motion to Set aside Dismissal for Want of Prosecution and Reinstate*** by depositing a copy of same in the United States Postal Service, properly addressed, with adequate postage affixed, to:

Harleysville Worcester Insurance Co
c/o Corporation Service Company – Registered Agent
2 Sun Court, Suite 400
Peachtree Corners, Georgia 30092

This the 26 day of June, 2023.



Amadu Wiltshire
Attorney for Plaintiff
Georgia Bar No. 473499

Wiltshire Law

1196 K Ashborough Dr SE
Marietta, Georgia 30067
Phone: 678-559-1883

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

TAKE FLIGHT EDUCATION LLC *

*

Plaintiff, * CIVIL ACTION FILE

*

vs. * 23-C-01319-S4

*

HARLEYSVILLE WORCESTER
INSURANCE CO *

*

Defendant. *

MOTION FOR APPOINTMENT OF PRIVATE PROCESS SERVER

Comes Now, Plaintiff, by and through counsel, and shows this Honorable Court the following:

1.

Plaintiff shows that the within and foregoing matter is a Complaint for Damages, and that it is in the interest of justice that a Private Process Server be appointed.

2.

Plaintiff requests that the Court appoint **Carvin O'Neal Self, Jr.**, who is over 18 years of age; a citizen of the United States and of the State of Georgia; who is not a party to the above-referenced case; who is not related to either of the parties herein by blood or marriage; and is not a convicted felon.

WHEREFORE, Plaintiff requests the appointment of the said **Carin O'Neal Self, Jr.** as provided by law.

Respectfully submitted this the 24 day of July, 2023.



Amadu Wiltshire, Esq.
Attorney for Plaintiff
Georgia Bar No. 473499

LAW OFFICES OF WILTSIRE, LLC
1196 K Ashborough Drive, SE Marietta GA 30067

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

TAKE FLIGHT EDUCATION LLC

*

*

Plaintiff,

*

CIVIL ACTION FILE

*

vs.

*

NO. 23-C-01319-S4

*

HARLEYSVILLE WORCESTER
INSURANCE CO

*

*

*

,
Defendant.

*

ORDER FOR APPOINTMENT OF PRIVATE PROCESS SERVER

Upon Motion for Appointment of Special Process Server, and it appearing appropriate, just and equitable,

IT IS HEREBY ORDERED AND ADJUDGED, that **Carvin O'Neal Self, Jr.** is a resident of the State of Georgia and citizen of the United States, is over the age of 18, is not a convicted felon, has no interest in the above-styled case, and is a Georgia Certified Process Server, is hereby appointed special agent for service in the case upon the Defendant.

SO ORDERED this 24 day of July, 2023.

RONDA S. COLVIN,
Judge Gwinnett State Court

Presented by:



Amadu Wiltshire, Esq.
Attorney for Plaintiff
Georgia Bar No. 473499
LAW OFFICES OF WILTSIRE, LLC
1196 K Ashborough Drive, SE
Marietta, Georgia 30067

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

TAKE FLIGHT EDUCATION LLC,

*

*

Plaintiff,

* CIVIL ACTION

*

vs.

* FILE NO.: 23-C-01319-S4

*

HARLEYSVILLE WORCESTER
INSURANCE CO,

*

*

*

Defendant.

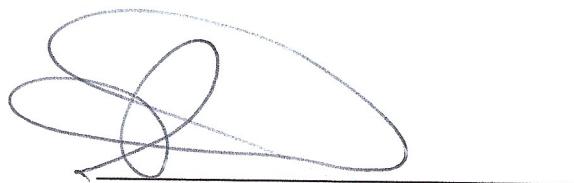
*

CERTIFICATE OF SERVICE

This is to certify that as of this date, I have served the following party with the foregoing *Motion to Set aside Dismissal for Want of Prosecution and Reinstate* by depositing a copy of same in the United States Postal Service, properly addressed, with adequate postage affixed, to:

Harleysville Worcester Insurance Co
c/o Corporation Service Company – Registered Agent
2 Sun Court, Suite 400
Peachtree Corners, Georgia 30092

This the 24 day of June, 2023.



Amadu Wiltshire
Attorney for Plaintiff
Georgia Bar No. 473499

Wiltshire Law

1196 K Ashborough Dr SE
Marietta, Georgia 30067
Phone: 678-559-1883

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

TAKE FLIGHT EDUCATION LLC,

*

*

Plaintiff,

*

CIVIL ACTION

*

vs.

*

FILE NO.: 23-C-01319-S4

HARLEYSVILLE WORCESTER
INSURANCE CO,

*

*

Defendant.

*

**ORDER SETTING ASIDE DISMISSAL FOR WANT OF PROSECUTION
AND REINSTATE**

WHEREAS on June 14, 2023, this Court entered a Dismissal for Want of Prosecution due to Plaintiff not appearing at the call of the Civil No Service Calendar on June 13, 2023, and whereas it appears that the Plaintiff had no notice of said hearing, and whereas counsel for Plaintiff thereafter having filed a Motion to Set Aside Dismissal for Want of Prosecution and Reinstate,

IT IS HEREBY ORDERED THAT this Court's June 14, 2023 Dismissal for Want of Prosecution shall be fully set aside, and the Clerk is hereby ordered to place this matter on the Court's next Peremptory Calendar for a status announcement.

SO ORDERED, this the 24 day of July, 2023.



Ronda S. Colvin, Judge
State Court of Gwinnett County

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

TAKE FLIGHT EDUCATION LLC

*

Plaintiff,

*

CIVIL ACTION FILE

*

vs.

*

NO. 23-C-01319-S4

*

HARLEYSVILLE WORCESTER
INSURANCE CO

*

,

*

*

Defendant.

*

ORDER FOR APPOINTMENT OF PRIVATE PROCESS SERVER

Upon Motion for Appointment of Special Process Server, and it appearing appropriate, just and equitable,

IT IS HEREBY ORDERED AND ADJUDGED, that **Carvin O'Neal Self, Jr.** is a resident of the State of Georgia and citizen of the United States, is over the age of 18, is not a convicted felon, has no interest in the above-styled case, and is a Georgia Certified Process Server, is hereby appointed special agent for service in the case upon the Defendant.

SO ORDERED this the 25 day of July, 2023.



RONDA S. COLVIN,
Judge Gwinnett State Court

Presented by:



Amadu Wiltshire, Esq.
Attorney for Plaintiff
Georgia Bar No. 473499
LAW OFFICES OF WILTSIRE, LLC
1196 K Ashborough Drive, SE
Marietta, Georgia 30067

IN THE STATE COURT OF GWINNETT COUNTY

23-C-01319-S4

7/25/2023 8:27 PM

TIANA P. GARNER, CLERK

STATE OF GEORGIA

TAKE FLIGHT EDUCATION LLC

CIVIL ACTION NUMBER: **23-C-01319-S4**

PLAINTIFF

VS.

**HARLEYSVILLE WORCESTER
INSURANCE CO**

DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Tiana P. Garner 75 Langley Dr, Lawrenceville, GA 30046

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 25 ~~26~~ **26TH** day of **july**, 20**23**.

Tiana P. Garner
Clerk of State Court

By 
Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.



null / ALL

Transmittal Number: 27429136
 Date Processed: 08/08/2023

Notice of Service of Process

Primary Contact: SOP Team nwsop@nationwide.com
 Nationwide Mutual Insurance Company
 Three Nationwide Plaza
 Columbus, OH 43215-2410

Electronic copy provided to: Ashley Roberts

Entity: Harleysville Worcester Insurance Company
 Entity ID Number 3316097

Entity Served: Harleysville Worcester Insurance Company

Title of Action: Take Flight Education, LLC vs. Harleysville Worcester Insurance Company

Matter Name/ID: Take Flight Education, LLC vs. Harleysville Worcester Insurance Company
 (14441170)

Document(s) Type: Summons/Complaint

Nature of Action: Contract

Court/Agency: Gwinnett County State Court, GA

Case/Reference No: 23-C-01319-S4

Jurisdiction Served: Georgia

Date Served on CSC: 08/08/2023

Answer or Appearance Due: 30 Days

Originally Served On: CSC

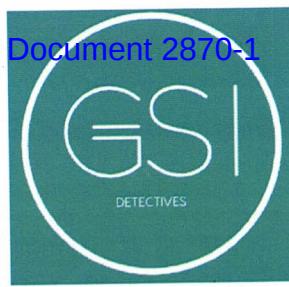
How Served: Personal Service

Sender Information: Law Offices of Wiltsidire LLC
 N/A

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com



Affidavit of Process Server

In The State Court of Gwinnett County, State of Georgia

(Name of Court)

Take Flight Education, LLC	VS	Harleysville Worcester Insurance Company	23-C-01319-S4
(Plaintiff/Petitioner)		(Defendant)	(CASE NO.)

I, Curvin O. Self, Jr. being first duly sworn, depose and say: that I am over the age of 18 years and not a party to this action, and that within the boundaries of the state of Georgia, I was authorized by law or order to perform said service.

SERVICE: I served: Harleysville Worcester Insurance Company

(Name of Person/Entity being served)

WITH (list documents) Summons and Complaint and Plaintiff's List of Exhibits

By Leaving with CT Corporation Registered Agent, Alisha Smith

RESIDENCE (address) _____
 BUSINESS(address) 2 Sun Court, Suite 400, Peachtree Corners, GA 30092
 OTHER(address) _____

ON (date) 8/8/2023 AT (time) 3:52PM

MANNER OF SERVICE:

PERSONAL: BY PERSONALLY DELIVERING COPIES TO THE PERSON BEING SERVED.

SUBSTITUTED AT RESIDENCE _____
 SUBSTITUTED AT BUSINESS _____

DESCRIPTION OF SERVICE: _____

SERVICE ATTEMPTS: Service was attempted on: (date/time) (1)

(2) _____ (3) _____ (4) _____

DESCRIPTION: Est- Age 48 Sex F Race Black Height 5'8" Weight 145 lbs. Hair Black Beard? No Glasses? No

Signature of Process Server Curvin O. Self, Jr.

SUBSCRIBED AND SWORN to before me this 9 day of August, 2023, by Curvin O. Self, Jr.
 Proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

SIGNATURE OF NOTARY PUBLIC Qutaibah Badwan

NOTARY PUBLIC for the state of GEORGIA

